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 EON CORP. IP HOLDINGS, LLC

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

EON CORP. IP HOLDINGS, LLC,

Plaintiff,

v.

SPRINT SPECTRUM, L.P.; ARUBA
 NETWORKS, INC.; BROADSOFT, INC.;
 CLAVISTER AB; CISCO SYSTEMS,
 INC.; MAVENIR SYSTEMS, INC.;
 MERU NETWORKS, INC.; SERCOMM
 CORPORATION; SONUS NETWORKS,
 INC.; STOKE, INC.; TAQUA, LLC; HTC
 AMERICA, INC.; UNITED STATES
 CELLULAR CORPORATION;

CASE NO. 3:12-cv-01011-JST

**STIPULATED REQUEST AND
~~[PROPOSED]~~ ORDER FOR EXTENSION
 OF TIME PURSUANT TO CIVIL LOCAL
 RULE 6-2 FOR PARTIES TO TAKE
 EXPERT DEPOSITIONS AFTER THE
 CLOSE OF EXPERT DISCOVERY**

MOTOROLA MOBILITY HOLDINGS,
INC.; MOTOROLA SOLUTIONS, INC.;
KINETO WIRELESS, INC.; and
AIRVANA, INC.,

Defendants.

Pursuant to Civil Local Rule 6-2, Plaintiff EON Corp. IP Holdings, LLC (“EON” or “Plaintiff”) and Defendants Sprint Spectrum, L.P. (“Sprint”), United States Cellular Corporation (“U.S. Cellular”), Cisco Systems, Inc. (“Cisco”), Motorola Mobility, LLC (“Motorola”), and HTC America, Inc. (“HTC”) (collectively “Defendants”) hereby stipulate to and request an extension of time allowing them to conduct the following expert depositions after the close of expert discovery on February 25, 2014¹:

- EON’s deposition of Dr. Stephen B. Wicker;
- EON’s deposition of Dr. W. Christopher Bakewell;
- Defendants’ deposition of Dr. Jay P. Kesan;
- EON’s deposition of Dr. Alan J. Cox;
- EON’s deposition of Dr. Kevin J. Negus; and
- Sprint, U.S. Cellular, Motorola, and HTC’s deposition of Dr. James J. Nawrocki.

Plaintiff and Defendants stipulate that these depositions will be completed by April 2, 2014. In order to facilitate these depositions, Plaintiff and Defendants further stipulate and request that the Court extend the deadline to file discovery motions relating to the expert depositions listed above until April 16, 2014. Currently, the deadline to file discovery motions relating to expert discovery is scheduled for March 11, 2014, 14 days after the close of expert discovery.²

This extension is necessary because the large number of parties and experts in this case have made scheduling the expert depositions identified above prior to the close of expert discovery exceedingly difficult. *See* Declaration of John V. Picone III in Support of this Stipulation, filed concurrently herewith (“Picone Decl.”), at ¶ 3. The time modifications

¹ *See* Scheduling Order, at page 2, line 14 (Dkt. No. 754).

² *Id.* at page 2, lines 15-16.

1 requested above should not affect any other scheduled event or deadline associated with this
 2 matter. *Id.* at ¶ 4.

3 The following are the previous time modifications in this case:

- 4 • Dkt. No. 206 filed March 16, 2011 – Motion for Extension of Time to File
 5 Response/Reply as to Motion to Dismiss by Cellular South;
- 6 • Dkt. No. 361 filed June 1, 2012 – Stipulated Request for Extension of Time to File
 7 ADR Certification and Stipulation to ADR Process or Notice of Need for ADR
 8 Telephone Conference;
- 9 • Dkt. No. 389 filed June 15, 2012 – Stipulated Request for an Extension of Time to
 10 File the ADR Certification and Stipulation to ADR Process or Notice of Need for
 11 ADR Telephone Conference;
- 12 • Dkt. No. 472 filed August 13, 2012 – Stipulated Request and Proposed Order for
 13 Extension of Time for Motorola Solutions, Inc. to File Response to Second
 14 Amended Complaint;
- 15 • Dkt. No. 473 filed August 13, 2012 – Stipulated Request and Proposed Order for
 16 Extension of Time for Motorola Mobility, Inc. to File Response to Second
 17 Amended Complaint;
- 18 • Dkt. No. 538 filed September 17, 2012 – Joint Stipulation and [Proposed] Order
 19 Extending the Parties' Time to Serve Privilege Logs;
- 20 • Dkt. No. 577 filed November 13, 2012 – Joint Stipulation and [Proposed] Order
 21 Extending the Parties' Time to File Their Joint Claim Construction and Prehearing
 22 Statement;
- 23 • Dkt. No. 584 filed November 26, 2012 – Joint Stipulation and [Proposed] Order
 24 Extending the Parties' Time to File Damages Contentions and/or Scope of
 25 Discovery Plan;
- 26 • Dkt. No. 673 filed April 8, 2013 – Motion for Extension of Time for EON to File a
 27 Response to SerComm's Notice of Motion and Motion to Compel Infringement
 28 Contentions that (1) Comply with Patent L.R. 3 1; and (2) For a Protective Order

1 to Stay or Limit Certain Discovery;

- 2 • Dkt. No. 677 filed April 18, 2013 – Stipulated Request and Proposed Order for
- 3 Extension of Time for EON to File a Response to SerComm’s Notice of Motion
- 4 and Motion to Compel Infringement Contentions that (1) Comply with Patent L.R.
- 5 3 1; and (2) For a Protective Order to Stay or Limit Certain Discovery;
- 6 • Dkt. No. 682 filed April 22, 2013 – Joint Motion for Extension of Time to File
- 7 Supplemental Joint Case Management Statement;
- 8 • Dkt. No. 703 filed May 2, 2013 – Stipulated Request and Proposed Order for
- 9 Extension of Time for EON to File a Response to SerComm’s Notice of Motion
- 10 and Motion to Compel Infringement Contentions that (1) Comply with Patent L.R.
- 11 3 1; and (2) For a Protective Order to Stay or Limit Certain Discovery;
- 12 • Dkt. No. 726 filed June 7, 2013 – Stipulated Request and Order for Extension of
- 13 Time to File a Joint or Competing Schedule (Dkt. No. 711);
- 14 • Dkt. No. 761 filed August 22, 2013 – Order Granting Stipulation (Dkt. No. 760) to
- 15 Extend ADR Deadline;
- 16 • Dkt. No. 770 filed September 16, 2013 – Order Granting Motion for Extension of
- 17 Time, Terminating as Moot Motion to File Under Seal, and Granting Amended
- 18 Administrative Motion to File Under Seal; and
- 19 • Dkt. No. 872 filed January 21, 2013 – Granting Stipulated Request and Proposed
- 20 Order for Extension of Time for Close of Fact Discovery and Expert Reports (Dkt.
- 21 No. 864).

22 *Id.* at ¶ 5.

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1 Dated: February 24, 2014

HOPKINS & CARLEY
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CERTIFICATION PURSUANT TO L.R. 5-1(i)(3)

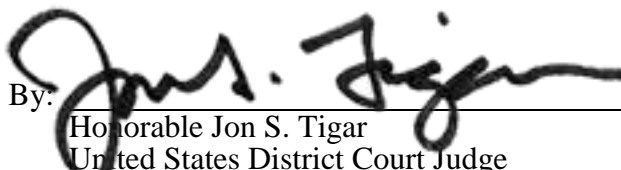
Pursuant to Local Rule 5-1(i)(3), I hereby certify that I have obtained concurrence in the filing of this document from all the signatories for whom a signature is indicated by a “conformed” signature (/s/) within this e-filed document. I have records to support this concurrence. My office will maintain these records for inspection, if so requested, or for production to the Court, if so ordered.

Executed on February 24, 2014, at San Jose, California.

/s/ John V. Picone III
John V. Picone III

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: February 26, 2014

By: 
Honorable Jon S. Tigar
United States District Court Judge